

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE, NORTHERN DIVISION

CYNTHIA RIDINGER, Individually,
and as the Surviving Spouse,
and Next of Kin of Henry C. Taylor, Jr. (Deceased),

Plaintiff,

v.

ERNEST K. RAGLAND, (in his individual capacity); and
JAMES BERRONG, (individually and his official
capacity as Sheriff of Blount County, Tennessee
and BLOUNT COUNTY, TENNESSEE,

Defendants.

Civil Action No. 3:14-cv-390

MOTION TO STAY

Comes the defendant, Ernest K. Ragland, in his individual capacity (hereinafter referred to as "Officer Ragland"), and Defendant Blount County, Tennessee, by and through counsel, and respectfully move respectfully move this Honorable Court to enter a protective order providing for a stay on all discovery as to all defendants based on the qualified immunity doctrine. Under the qualified immunity doctrine, discovery in this matter should be stayed until the Court makes a decision on Officer Ragland's pending *Motion for Summary Judgment* (Doc. 17). Defendants should not have to face the burdens of litigation, including discovery, until the issue of qualified immunity is decided.

WHEREFORE, based on the above, defendants respectfully move this Honorable Court to enter a protective order providing a stay on all discovery as to all defendants until the Court rules on Officer Ragland's pending motions for summary judgment based on the qualified immunity doctrine.

Respectfully submitted this 10th day of December 2014.

/s Gary M. Prince

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CERTIFICATE OF SERVICE

I do hereby certify that on November ____, 2014, an exact copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt:

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